



HINSHAW & CULBERTSON LLP

Attorneys at Law

151 North Franklin Street

Suite 2500

Chicago, IL 60606

312-704-3000

312-704-3001 (fax)

www.hinshawlaw.com

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Via ECF

Hon. James R. Cho
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Joseph, et al. v. Frontier Airlines, Inc.*
Case No. 1:21-cv-06054-WFK-JRC

Dear Magistrate Judge Cho:

Following the Initial Conference proceedings held before the Court, and pursuant to the Minute Order issued by this Court on October 31, 2023, the parties hereby submit a joint status report regarding discovery with notification as to whether they would like referral to Court-annexed mediation or a settlement conference at that time.

Discovery: Below is a summary of the parties' discovery efforts made since the Initial Conference proceedings held before the Court:

Plaintiffs and Frontier have served their Initial Disclosures.

Also, on November 30, 2023, Frontier circulated to Plaintiffs a draft joint motion for the parties' previously agreed upon protective order. Plaintiffs have agreed to the terms of the protective order and the joint motion. Accordingly, the parties intend to file joint motion for a protective order forthwith.

On December 13, 2023, Frontier served its First Set of Interrogatories to Plaintiffs. Frontier also re-circulated its original First Set of Requests to Produce to Plaintiffs, which were originally served on Plaintiffs in 2022, and are deemed served as of the date of the completed Rule 26(f) conference held on October 24, 2023. Plaintiffs have made an initial production of certain documents responsive to Frontier's First Set of Requests to Produce but have not yet served written responses to Frontier's initial sets of written discovery. The parties are conferring regarding when Plaintiffs will be responding to Frontier's written discovery.

On December 20, 2023, Frontier served notices of the videotaped depositions of certain adult Plaintiffs to proceed during the weeks of March 4 and March 11, 2024.

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Settlement Conference: The parties have conferred regarding a potential referral to Court-annexed mediation or an in-person settlement conference with the Court. At this time, the parties believe it is premature to engage in mediation or a settlement conference with the Court. As discovery progresses, the parties will consider whether a referral is appropriate and advise the Court accordingly.

Respectfully submitted,

s/ Dov Medinets

ATTORNEY FOR PLAINTIFFS

Dov Medinets
Gutman Weiss P.C.
2276 Sixty-Fifth Street, 2nd Floor
Brooklyn, NY 11204
Telephone: (718) 259-2100
dm@gwpclaw.com

s/ Evan Kwart

ATTORNEYS FOR DEFENDANT

Brian T. Maye (Admitted *Pro Hac Vice*)
Kristin A. Hoffman (Admitted *Pro Hac Vice*)
Hinshaw & Culbertson LLP
151 N. Franklin Street, Suite 2500
Chicago, Illinois 60606
Telephone: (312) 704-3000
bmaye@hinshawlaw.com
khoffman@hinshawlaw.com

&

Evan Kwart
800 Third Avenue, 13th Floor
New York, NY 10022
Telephone: (212) 655-3839
ekwart@hinshawlaw.com

cc: Attorneys of Record via ECF